

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ROW VAUGHN WELLS, INDIVIDUALLY)
AND AS ADMINISTRATRIX OF THE)
ESTATE OF TYRE DEANDRE NICHOLS,)
DECEASED,)

Plaintiffs,

V.

CASE NO. 2:23-CV-02224
JURY DEMAND

THE CITY OF MEMPHIS, A
MUNICIPALITY; CHIEF CERELYN DAVIS,
IN HER OFFICIAL CAPACITY; EMMITT
MARTIN III, IN HIS INDIVIDUAL
CAPACITY; DEMETRIUS HALEY, IN HIS
INDIVIDUAL CAPACITY; JUSTIN SMITH,
IN HIS INDIVIDUAL CAPACITY;
DESMOND MILLS, JR. IN HIS INDIVIDUAL
CAPACITY; TADARRIUS BEAN, IN HIS
INDIVIDUAL CAPACITY; PRESTON
HEMPHILL, IN HIS INDIVIDUAL
CAPACITY; ROBERT LONG, IN HIS
INDIVIDUAL CAPACITY; JAMICHAEL
SANDRIDGE, IN HIS INDIVIDUAL
CAPACITY; MICHELLE WHITAKER, IN
HER INDIVIDUAL CAPACITY; DEWAYNE
SMITH, IN HIS INDIVIDUAL CAPACITY
AND AS AGENT OF THE CITY OF
MEMPHIS,

Defendants.

**DEFENDANT CITY OF MEMPHIS' RESPONSES TO PLAINTIFF'S
SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Defendant the City of Memphis (“the City”), pursuant to Rule 34 of the Federal Rules of Civil Procedure, responds to Plaintiff’s Second Requests for Production as follows:

The City reserves the right to amend or supplement these responses as additional

information become available through discovery and/or expert opinion or otherwise.

All Bates Numbers listed in this document refer to the beginning Bates Number of the document unless specifically noted otherwise.

RESPONSES TO SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS

27. Produce any and all notes, memoranda, and/or minutes memorializing the confirmation hearing of Cerelyn Davis.

RESPONSE: The City objects to this Request to the extent it seeks documents, communications, writings, and/or things protected by the attorney-client privilege. Subject to its objection, the City is continuing to search for non-privileged documents responsive to this Request and will supplement this Response and its production of documents accordingly.

28. Produce any and all documents regarding Cerelyn Davis, the Atlanta Police Department, the Durham Police Department, and/or the Atlanta Police Department's "Red Dog" unit which the City of Memphis or its agents consulted, reviewed, and/or used in making the decision to hire Cerelyn Davis as Chief of Police.

RESPONSE: The City objects to this Request to the extent it seeks documents, communications, writings, and/or things protected by the attorney-client privilege. Subject to its objection, the City is continuing to search for non-privileged documents responsive to this Request and will supplement this Response and its production of documents accordingly.

29. Please make available for inspection and imaging the following mobile or cellular telephones

- a. Cerelyn Davis, Emmitt Martin III, Demetrius Haley, Justin Smith, Desmond Mill, Jr., Tadarrius Bean, Preston Hemphill, Robert Long, JaMichael Sandridge, Michelle Whitaker, and DeWayne Smith in their possession from January 6, 2023- January 25, 2023

b. The following inventoried items:

- i. Evidence Item 0001 Samsung A53 Black Cellphone w/ Blk Case (J. Smith), mentioned at Bates COM_0001479 and COM 001484.
- ii. Evidence Item 0002 1-Samsung AS3 Black Cellphone w/ Blk Case (P, mentioned at Bates COM_0001479 and COM 001484.
- iii. Evidence Item 0003 1-Samsung AS3 Black Cellphone w/ Blk Case (D, mentioned at Bates COM_0001479 and COM 001484.
- iv. Evidence Item 0004 1-Samsung AS3 Black Cellphone w/ Blk Case (D, mentioned at Bates COM_0001479 and COM 001484.
- v. Evidence Item 0005 1-Samsung AS3 Black Cellphone w/ Blk Case (T, mentioned at Bates COM_0001479 and COM 001484.
- vi. Evidence Item 0006 1-Samsung AS3 Black Cellphone w/ Blk Case (C, mentioned at Bates COM_0001479 and COM 001484.
- vii. Evidence Item 0007 1-Samsung AS3 Black Cellphone w/ Blk Case (E, mentioned at Bates COM_0001479 and COM 001484.
- viii. Evidence Item 0001 1-Black Hikvision NVR Serial Number: 714623636, mentioned at Bates COM_00001480 and COM 00001483.

RESPONSE: The City responds that the items identified in this Request are not in the possession, custody, or control of the City.

30. Any all communications from or to any employees, agents, affiliates, or members of the Memphis Police Department or the City of Memphis, including Defendant Chief Cerelyn Davis and any and all named Defendants, from January 6, 2023 - January 25, 2023 including but not limited to phone call logs, text messages, emails, social media messages, posts, or direct messages (including Facebook, Instagram, Snapchat, TikTok, X, Twitter, Slack, WhatsApp, etc.), or any other records of communication

RESPONSE: The City objects to this Request as overbroad and not proportional to the needs of this case. The Request seeks *all communications from or to any City employee* for a twenty-day period in January 2023. Other than the temporal limitation, the Request is unlimited in

scope and encompasses a corpus of communications that have nothing to do with the allegations in this litigation. The City is withholding documents based on this objection.

31. Any all communications from or to any employees, agents, affiliates, or members of the Memphis Police Department or the City of Memphis, including Defendant Chief Cerelyn Davis and any and all named Defendants, in any way related to the January 7, 2023 incident involving Tyre Nichols, including but not limited to phone call logs, text messages, emails, social media messages, posts, or direct messages (including Facebook, Instagram, Snapchat, TikTok, X, Twitter, Slack, WhatsApp, etc.), or any other records of communication.

RESPONSE: The City objects to this Request as overbroad and not proportional to the needs of this case. The Request as stated includes communications from or to any City employee regarding the incident giving rise to the lawsuit. Given that the City employs thousands of people who may have communicated regarding the incident, the Request is overbroad. The City reiterates that it offered a proposed list of custodians to Plaintiff several months ago and stands ready to continue those discussions. The City is withholding documents responsive to this Request.

[UNNUMBERED REQUEST] Any and all call originations, call terminations, call attempts, voice and text message transactions, including push to talk, data communications, SMS and MMS communications, stored SMS content, MMS content and / or Browser Cache, and voice communications, LTE and/or IP sessions and destinations, eHRPD with cell site information, including the originating and receiving phone numbers or network IDs for all incoming and outgoing call transactions, data transactions and push to talk sessions from or to the personal or professional cellular telephone or mobile telephone of any employees, agents, affiliates, or members of the Memphis Police Department or the City of Memphis, including Defendant Chief Cerelyn Davis and any and all named Defendants, in any way related to the January 7, 2023

incident involving Tyre Nichols. All responsive data is to be provided in both Adobe PDF format and/or Microsoft Excel format, .TXT or .CSV format.

RESPONSE: The City objects to this Request as overbroad and not proportional to the needs of this case. The City further states that it does not maintain the information that the Request seeks. As such, the City does not believe it is withholding any documents to this Request, but the City will continue to search to confirm this.

32. Any and all call originations, call terminations, call attempts, voice and text message transactions, including push to talk, data communications, SMS and MMS communications, stored SMS content, MMS content and / or Browser Cache, and voice communications, LTE and/or IP sessions and destinations, eHRPD with cell site information, including the originating and receiving phone numbers or network IDs for all incoming and outgoing call transactions, data transactions and push to talk sessions from or to any named Defendant, from January 6, 2023- January 25, 2023. All responsive data is to be provided in both Adobe PDF format and/or Microsoft Excel format, .TXT or .CSV format.

RESPONSE: The City objects to this Request as overbroad and not proportional to the needs of this case. The City further states that it does not maintain the information that the Request seeks, particularly to the extent the Request seeks information maintained by the named Defendants on their personal phones and devices. As such, the City does not believe it is withholding any documents to this Request, but the City will continue to search to confirm this.

33. Produce any and all policies, general orders, department rules, and/or department regulations applicable to the Memphis Police Department at the time of Tyre Nichols' death.

RESPONSE: The City identifies MPD Policy and Procedures, which is being produced contemporaneously with these responses as Bates Numbers COM_0016923 – COM_0017673.

34. Produce an entire copy of any handbook or manual applicable to the Memphis Police Department at the time of Tyre Nichols' death.

RESPONSE: The City identifies the MPD Standard Operating Procedures which were previously produced as Bates Numbers COM_0007030, COM_0007847, COM_0007910, COM_0007914, COM_0007918, COM_0007919, COM_0008031, COM_0008070, COM_0008072, COM_0008129, COM_0008146, COM_0008174, COM_0008210, COM_0008223, COM_0008293, COM_0008301, COM_0008306, COM_0008352, COM_0008417, COM_0008495, COM_0008535, COM_0008538, COM_0008562, COM_0008583, COM_0008658, COM_0008684, COM_0008688, COM_0008702, COM_0008724, COM_0008752, COM_0008864, COM_0008885, COM_0008890, COM_0008931, COM_0008936, COM_0009100, COM_0009109, COM_0009163, COM_0009196, COM_0009199, COM_0009214, COM_0009227, COM_0009252, COM_0009298, COM_0009342, COM_0009875, COM_0009901, COM_0009912, COM_0009972, COM_0009990, COM_0009999, and COM_0010004.

35. Produce an entire copy of any training manual applicable to the Memphis Police Department at the time of Tyre Nichols' death.

RESPONSE: The City identifies MPD Training Materials, which were previously produced. The corresponding Bates Numbers are provided in a spreadsheet produced herewith.

36. Produce any and all policies, procedures, general orders, rules, regulations, customs, or practices which carried the force of law upon the Memphis Police Department at the time of Tyre Nichols' death.

RESPONSE: The City identifies MPD Policy and Procedures and MPD Standard Operating Procedures, which are identified by Bates Number in response to Request Nos. 33 and

34. The City further identifies MPD Training materials, which are identified by Bates Number in a spreadsheet produced herewith.

37. Produce any and all policies, general orders, department rules, and/or department regulations applicable to the Memphis Police Department's SCORPION unit at the time of Tyre Nichols' death.

RESPONSE: The City identifies the Standard Operating Procedures for the Organized Crime Unit, of which the SCORPION Unit was a subunit, which were previously produced as Bates Numbers COM_0000972, COM_0005701, COM_0005710, COM_0005717, COM_0005722, COM_0005726, COM_0005728, COM_0005732, COM_0005733, COM_0005737, COM_0005748, COM_0005750, COM_0005751, COM_0005755, COM_0005767, COM_0005774, COM_0005776, COM_0005778, COM_0005779, COM_0005780, COM_0005787, COM_0005789, and COM_0005801.

38. Produce an entire copy of any handbook or manual applicable to the Memphis Police Department's SCORPION unit at the time of Tyre Nichols' death.

RESPONSE: The City identifies the Standard Operating Procedures for the Organized Crime Unit, of which the SCORPION Unit was a subunit, which are identified by Bates Number in response to Request No. 37.

39. Produce an entire copy of any training manual applicable to the Memphis Police Department's SCORPION unit at the time of Tyre Nichols' death.

RESPONSE: The City identifies MPD Training Materials and OCU Training Materials, which were previously produced. The corresponding Bates Numbers are provided in a spreadsheet produced herewith.

40. Produce any and all policies, procedures, general orders, rules, regulations,

customs, or practices which carried the force of law upon the Memphis Police Department's SCORPION unit at the time of Tyre Nichols' death.

RESPONSE: The City identifies the MPD Policy and Procedures, MPD Standard Operating Procedures, MPD Training Materials, OCU Training Materials, and OCU Standard Operating Procedures, which are identified by Bates Number in response to Request Nos. 33, 34, 37, or in a spreadsheet produced herewith.

41. Produce any and all policies general orders, department rules, and/or department regulations applicable to the Memphis Fire Department at the time of Tyre Nichols' death.

RESPONSE: The City identifies Memphis Fire Department ("MFD") policies and procedures, which will be produced as part of the City's rolling production of documents.

42. Produce an entire copy of any handbook or manual applicable to the Memphis Fire Department at the time of Tyre Nichols' death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

43. Produce an entire copy of any training manual applicable to the Memphis Fire Department at the time of Tyre Nichols' death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

44. Produce any and all policies, procedures, general orders, rules, regulations, customs, or practices which carry the force of law upon the Memphis Fire Department at the time of Tyre Nichols' death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

45. Produce a copy of each policy, general order, department rule, and/or department regulation referenced on the first two pages of the Case Synopsis set forth by the City of Memphis Police Division, Inspectional Services Bureau (bates-stamp COM_00000970-COM_00000970).

RESPONSE: The City identifies the MPD Policy and Procedures, which is identified by Bates Number in response to Request No. 33. The City specifically identifies Bates Numbers COM_0016955 – COM_0016983.

46. Produce a copy of each policy, general order, department rule, and/or department regulation found to have been violated by any employee of the City of Memphis in relation to the death of Tyre Nichols.

RESPONSE: The City identifies the MPD Policy and Procedures, which is identified by Bates Number in response to Request No. 33. The City specifically identifies Bates Numbers COM_0016955 – COM_0016983.

47. Produce any and all documents reflecting and/or describing any requirements, certifications, and/or training to be completed by any City of Memphis emergency medical technician at the time of Tyre Nichols's death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

48. Produce any and all documents reflecting and/or describing any requirements, certifications, and/or training to be completed by any City of Memphis paramedic at the time of Tyre Nichols's death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

49. Produce any and all documents describing the duties and/or responsibilities of a

City of Memphis emergency medical technician at the time of Tyre Nichols's death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

50. Produce any and all documents describing the duties and/or responsibilities of a City of Memphis paramedic at the time of Tyre Nichols's death.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

51. Produce any and all documents used to train City of Memphis police officers between January 7, 2018, and January 7, 2023.

RESPONSE: The City identifies MPD Training Materials and OCU Training Materials, which are identified by Bates Number in a spreadsheet produced herewith.

52. Produce any and all documents used to train City of Memphis emergency medical technicians between January 7, 2018, and January 7, 2023.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

53. Produce any and all documents used to train City of Memphis paramedics between January 7, 2018, and January 7, 2023.

RESPONSE: The City will produce all MFD policies, procedures, and training materials on a rolling basis.

54. Produce any and all documents documenting, reflecting, or describing changes made to the City of Memphis's policies, procedures, general orders, rules, regulations, customs, practices, and/or training as a result of Tyre Nichols's killing.

RESPONSE: The City is continuing to search for documents responsive to this Request

and will supplement this Response and its production of documents accordingly.

55. Produce any and all documents describing any and all tactical gear and clothing that City of Memphis police officers are provided upon employment with the City of Memphis.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by officers on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

56. Produce any and all documents describing the tactical gear and clothing that the City of Memphis issued to any named defendant at any time.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by officers at any time. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

57. Produce an exemplar of each article of clothing and tactical gear worn by any individual who responded to the incident involving Tyre Nichols on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that

could have been worn by officers on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

58. Produce an exemplar of each article of clothing and tactical gear worn by all named defendants on the evening of January 7, 2023, during the incident involving Tyre Nichols.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by officers on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

59. Permit for inspection each article of clothing and tactical gear issued to Memphis police officers which would have been worn by Memphis police officers on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by every MPD officer on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

60. Permit for inspection each article of clothing and tactical gear issued to Memphis

police officers in the SCORPION unit which could have been worn by Memphis police officers in the SCORPION unit on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by every MPD SCORPION Unit officer on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

61. Permit for inspection each article of clothing and tactical gear worn by any named defendant during the incident involving Tyre Nichols on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by any officer on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

62. Permit Plaintiff’s attorney and expert witness to inspect each article of clothing and tactical gear worn by the individual defendants during the incident involving Tyre Nichols on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and

gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by any officer on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

63. Permit Plaintiff’s attorney and expert witness to inspect each tactical item, including any baton, handcuffs, and pepper spray canister, used by any individual defendant during the incident involving Tyre Nichols on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been used by any officer on a given date over fifteen months ago. The City further objects to this Request on the basis that the term “tactical gear” is vague and undefined. Subject to its objections, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

64. Produce the physical dimensions of each article of clothing and tactical gear worn by Defendants Mills, Justin Smith, Bean, Haley, and Martin during the incident involving Tyre Nichols on January 7, 2023.

RESPONSE: The City does not maintain records of the physical dimensions of clothing and gear, and therefore, the City has no documents responsive to this Request.

65. Produce physical measurements of the height and length in inches and centimeters of each of the letters on the back of individual Defendants’ vests which read “MEMPHIS POLICE SCORPION TEAM 1.”

RESPONSE: The City does not maintain records of this information, and therefore, the City has no documents responsive to this Request.

66. Produce any document identifying the brand, physical dimensions, and/or material of any article of clothing worn by any of the individual defendants during the incident involving Tyre Nichols on January 7, 2023.

RESPONSE: The City objects to this Request as overbroad and not reasonably calculated to lead to the discovery of relevant information. MPD officers purchase their own clothing and gear, so the City does not own these items. As such, it is impossible to know the exact items that could have been worn by officers on a given date over months ago. Subject to its objection, the City responds that the items identified in this Request are not in the possession, custody, or control of the City.

67. Any and all records which describe the physical dimensions of Defendant Haley, Defendant Mills, Defendant Bean, Defendant Justin Smith, or Defendant Martin, such as their height and weight.

RESPONSE: The City does not maintain this information, and it has no documents responsive to this Request.

68. Any statement made by Cerelyn Davis regarding the killing of George Floyd on May 25, 2020, including but not limited to criticisms or critiques of Derek Chauvin and the Minneapolis Police Department.

RESPONSE: The City objects to this Request as not reasonably calculated to lead to the discovery of relevant information. Subject to its objection, the City responds that Chief Davis was not employed by the City or the Memphis Police Department in the year 2020. As such, the City does not have any documents responsive to this request in its possession, custody, or control.

69. Any minutes, memorandum, recordings, and/or notes related to the Memphis City Council's consideration of Cerelyn Davis's reappointment to the position of Chief of Police.

RESPONSE: The City is searching for responsive documents, and it will supplement this Response accordingly.

70. Please reproduce the following documents in .pdf format, as they were originally disclosed in a fashion not accessible by Plaintiff:

COM_0001907	COM_0005508	COM_0005572	COM_0006002	COM_0006137
COM_0001908	COM_0005509	COM_0005573	COM_0006003	COM_0006138
COM_0001909	COM_0005515	COM_0005576	COM_0006004	COM_0006139
COM_0001951	COM_0005527	COM_0005577	COM_0006005	COM_0006140
COM_0002219	COM_0005528	COM_0005578	COM_0006006	COM_0006141
COM_0002220	COM_0005529	COM_0005579	COM_0006007	COM_0006142
COM_0002221	COM_0005530	COM_0005580	COM_0006008	COM_0006143
COM_0002231	COM_0005531	COM_0005581	COM_0006009	COM_0006852
COM_0002928	COM_0005532	COM_0005582	COM_0006010	COM_0006854
COM_0002929	COM_0005533	COM_0005583	COM_0006011	COM_0006890
COM_0002933	COM_0005535	COM_0005584	COM_0006012	COM_0006891
COM_0002934	COM_0005536	COM_0005585	COM_0006013	COM_0007137
COM_0002935	COM_0005540	COM_0005586	COM_0006014	COM_0007138
COM_0002936	COM_0005541	COM_0005587	COM_0006015	COM_0007139
COM_0002943	COM_0005542	COM_0005588	COM_0006016	COM_0007140
COM_0002944	COM_0005543	COM_0005589	COM_0006076	COM_0007141
COM_0004955	COM_0005552	COM_0005590	COM_0006077	COM_0007142
COM_0004956	COM_0005553	COM_0005591	COM_0006078	COM_0007143
COM_0004960	COM_0005568	COM_0005592	COM_0006081	COM_0007547
COM_0004961	COM_0005569	COM_0005593	COM_0006122	COM_0007548
COM_0004962	COM_0005570	COM_0005594	COM_0006123	COM_0007549
COM_0004963	COM_0005571	COM_0005595	COM_0006124	COM_0007550
COM_0005251	COM_0005572	COM_0005596	COM_0006125	COM_0007551
COM_0005252	COM_0005561	COM_0005597	COM_0006126	COM_0007552
COM_0005253	COM_0005562	COM_0005598	COM_0006127	COM_0007553
COM_0005254	COM_0005563	COM_0005599	COM_0006128	COM_0009496
COM_0005255	COM_0005564	COM_0005993	COM_0006129	COM_0009865
COM_0005256	COM_0005565	COM_0005994	COM_0006130	COM_0009866
COM_0005257	COM_0005566	COM_0005995	COM_0006131	COM_0010733
COM_0005288	COM_0005567	COM_0005996	COM_0006132	COM_0010734
COM_0005289	COM_0005568	COM_0005997	COM_0006133	COM_0010736
COM_0005290	COM_0005569	COM_0005998	COM_0006134	COM_0010738
COM_0005291	COM_0005570	COM_0005999	COM_0006135	COM_0010748
COM_0005293	COM_0005571	COM_0006001	COM_0006136	COM_0010750

COM_0010751	COM_0011935	COM_0011951	COM_0012088	COM_0012093
COM_0011887	COM_0011940	COM_0011956	COM_0012089	
COM_0011899	COM_0011942	COM_0011980	COM_0012090	
COM_0011910	COM_0011944	COM_0011983	COM_0012091	
COM_0011926	COM_0011947	COM_0012085	COM_0012092	

RESPONSE: The City is working to resolve any technical issues and will re-produce the documents identified in this Request once any issues are resolved.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Bruce McMullen

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*Attorneys for Defendant City of Memphis,
Chief Cerelyn Davis in her Official
Capacity, and Dewayne Smith as Agent of
the City of Memphis*

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2024, a copy of the foregoing document was served on all counsel of record via e-mail:

s/ Bruce McMullen